

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,
ELECTRICAL WORKERS' HEALTH AND
WELFARE FUND, LOCAL 103, I.B.E.W.;
ELECTRICAL WORKERS' PENSION FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
SUPPLEMENTARY HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' DEFERRED INCOME FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
JOINT APPRENTICESHIP AND TRAINING
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' EDUCATIONAL AND CULTURAL
FUND; ANTHONY J. SALAMONE, as he is
ADMINISTRATOR, NATIONAL ELECTRICAL
BENEFIT FUND; and LOCAL 103, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS,

Plaintiffs

vs.

A.C. ELECTRICAL SYSTEMS, INC.,
Defendant

and

SOVEREIGN BANK,
Trustee

C.A. No. 04-11970 DPW

VERIFIED REQUEST TO ENTER DEFAULT

Plaintiffs Russell F. Sheehan, as he is Administrator, Electrical Workers' Health and Welfare Fund, Local 103, I.B.E.W., et al, request the Clerk to enter the default of A.C. Electrical Systems, Inc. (hereinafter "A.C."). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on September 9, 2004.
- 2) Complaint was served upon defendant's counsel as registered agent for defendant A.C. on November 1, 2004.
- 3) A.C. has never filed an Answer or a responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

RUSSELL F. SHEEHAN, as he is
ADMINISTRATOR, ELECTRICAL
WORKERS' HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W., et al,

By their attorneys,

/s/ Gregory A. Geiman
Anne R. Sills, Esquire
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Gregory A. Geiman, Esquire
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11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

Dated: March 11, 2005

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Verified Request to Enter Default has been served upon the Defendant at its last-known address, 127 Gallatin Street, Providence, RI 02907, by first class mail this 11th day of March, 2005.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire